

Exhibit A

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Via Email and US Mail

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Re: Robert G. Harbridge v. C. R. Bard, Inc., Case No. 2:16-cv-00008-DGC, MDL 2641, In Re Bard IVC Filters Products Liability Litigation

Dear Max:

Plaintiff in the above-referenced matter filed a short form complaint on January 5, 2016 naming only C. R. Bard, Inc. (“Bard”) as a defendant. On February 12, 2016, without leave of court or Bard’s consent, Plaintiff filed an amended short form complaint naming both Bard and Bard Peripheral Vascular, Inc. as defendants. This amended complaint was improperly filed in violation of Federal Rule of Civil Procedure 15.

Accordingly, please withdraw Plaintiff’s February 12, 2016 amended complaint within 10 days from receipt of this letter and seek leave of court pursuant to Rule 15. If the amended complaint is not withdrawn, Bard will move to strike it.

With best regards, I am

Sincerely yours,



Richard B. North, Jr.

RBN:ajr

With offices in the District of Columbia, Florida, Georgia, Massachusetts, New York, North Carolina, South Carolina, Tennessee and West Virginia